

NICHOLAS A. TRUTANICH  
United States Attorney  
District of Nevada  
Nevada Bar No. 13644  
PATRICK BURNS  
Nevada Bar No. 11779  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336/Fax: (702) 388- 6418  
John.P.Burns@usdoj.gov

*Attorneys for the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**SHAUN PATRICK ANDERSON,**

**Defendant.**

**CASE NO: 2:17-cr-00363-APG-GWF**

**STIPULATION TO CONTINUE  
SENTENCING DATE**

**(FIRST REQUEST)**

It is hereby stipulated and agreed, by and between Nicholas A. Trutanich, United States Attorney, through Patrick Burns, Assistant United States Attorney, and Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Defendant Shaun Patrick Anderson, that the sentencing in the above-captioned matter, previously scheduled for February 18, 2020, at 9:30 a.m., be vacated and continued until a time convenient to the Court, but at some time after March 9, 2020.

This Stipulation is entered into for the following reasons:

1. Defendant Anderson has previously pleaded guilty to the indictment in this case without a negotiation. Sentencing is currently set for February 18, 2020.

2. The parties expect significant litigation over the sentencing guidelines application in this case and the sentence to be imposed. The government anticipates possibly being required to call witnesses at the sentencing hearing, including the FBI task force officer

1 (TFO) currently acting as the case agent for this case, LVMPD Detective Steven Sansonetti.  
2 TFO/Detective Sansonetti is unavailable for the sentencing hearing due to required training  
3 during a period encompassing February 18, 2020 when this sentencing is scheduled to occur.  
4 The government anticipates that his testimony and/or assistance at the hearing may be  
5 required to resolve disputed factual issues bearing on Anderson's sentencing guidelines  
6 calculation and sentence.

7 3. Defendant is in custody, but does not oppose this request.

8 4. To accommodate defense counsel's schedule, the parties request a resetting to  
9 a date convenient to the Court but occurring after March 9, 2020. The parties also agree that  
10 the reset sentencing date shall determine new deadlines for sentencing objections and  
11 memoranda in accordance with Local Rule LCR 32-1.

12 5. This request is made in good faith and not for purposes of delay.

13 6. This is the first request for a continuance of the sentencing filed in this matter.

14 Dated this 5th day of February, 2020

15 NICHOLAS A. TRUTANICH  
16 United States Attorney

17 By: //s//  
18 HEIDI A. OJEDA.  
19 Assistant Federal Public Defender  
20 Counsel for Defendant ANDERSON

21 By: //s//  
22 PATRICK BURNS  
23 Assistant United States Attorney

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**SHAUN PATRICK ANDERSON,**

**Defendant.**

**CASE NO: 2:17-cr-00363-APG-GWF**

**FINDINGS OF FACT AND ORDER**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defendant Anderson has previously pleaded guilty without a negotiation to the indictment in this case. Sentencing is currently set for February 18, 2020.

2. The parties expect significant litigation over the sentencing guidelines application in this case and the sentence to be imposed. The government anticipates possibly being required to call witnesses at the sentencing hearing, including the FBI task force officer (TFO) currently acting as the case agent for this case, LVMPD Detective Steven Sansonetti. TFO/Detective Sansonetti is unavailable for the sentencing hearing due to required training during a period encompassing February 18, 2020 when this sentencing is scheduled to occur. The government anticipates that his testimony and/or assistance at the hearing may be required to resolve disputed factual issues bearing on Anderson's sentencing guidelines calculation and sentence.

3. Defendant is in custody, but does not oppose this request.

4. To accommodate defense counsel's schedule, the parties request a resetting to a date convenient to the Court but occurring after March 9, 2020. The parties also agree that

1 the reset sentencing date shall determine new deadlines for sentencing objections and  
2 memoranda per the District Court's local rules.

3 5. This request is made in good faith and not for purposes of delay.

4 6. This is the first request for a continuance of the sentencing filed in this matter.

5 For all of the above-stated reasons, the ends of justice would be served best by a  
6 continuance of the trial date.

7 **ORDER**

8 IT IS ORDERED that the sentencing hearing in *United States v. Shaun Patrick Anderson*,  
9 2:17-cr-00363-APG-GWF, previously scheduled for February 18, 2020 at 9:30 a.m., is  
10 vacated and continued until March 16, 2020 at 10:00 a.m. in courtroom 6C. The  
11 deadlines for filing sentencing memoranda and objections are hereby reset in accordance  
12 with Local Rule LCR 32-1.

13 Dated this 6th day of February, 2020

14 By: 

15 JUDGE ANDREW P. GORDON  
16 UNITED STATES DISTRICT COURT JUDGE  
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## Certificate of Service

I, Patrick Burns, hereby certify that I am an employee of the United States Department of Justice, and that on this day I served a copy of the following: **STIPULATION TO CONTINUE SENTENCING DATE**, upon counsel for all defendants appearing in this matter via the CM/ECF system, by electronically filing said document.

Dated: February 5, 2020

//s// Patrick Burns  
PATRICK BURNS  
Assistant United States Attorney  
District of Nevada